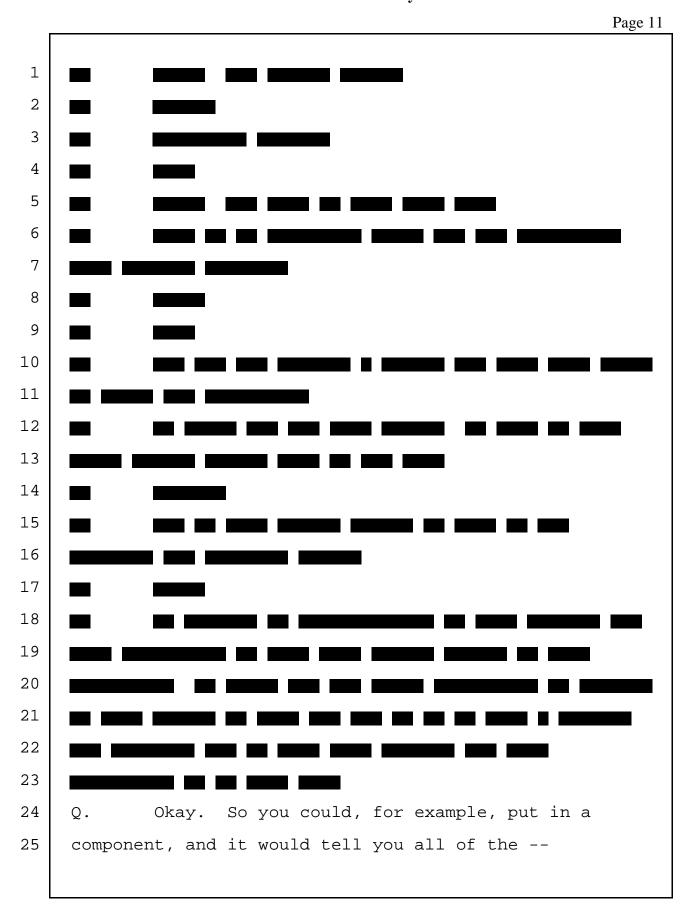
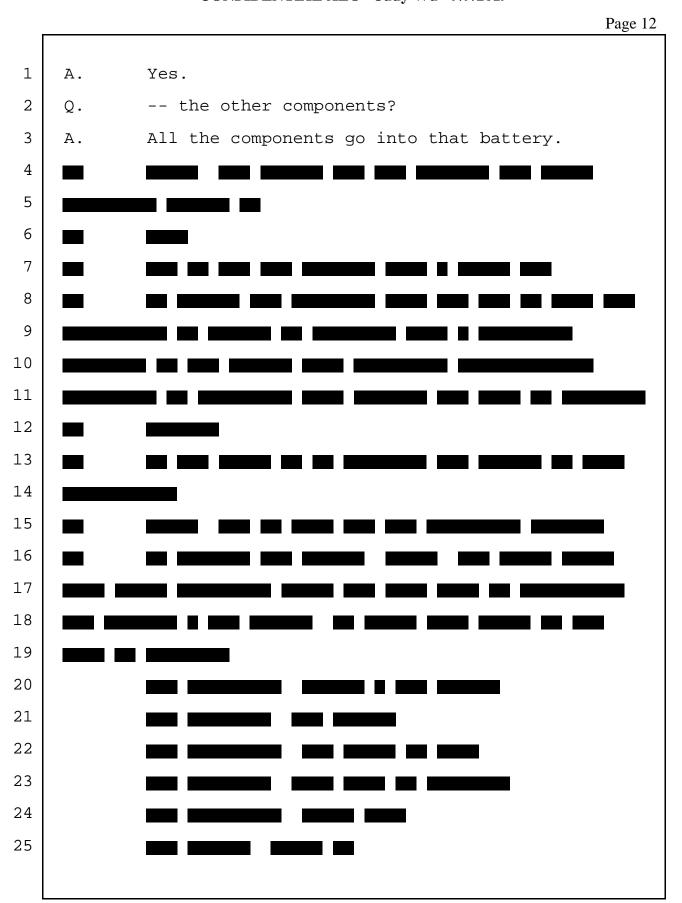
Exhibit 52 Judy Wu Deposition Excerpts

Page 1

UNITED STATES	DISTRICT COURT
DISTRICT	OF NEVADA
TESLA, INC., a Delaware corporation,	
Plaintiff,)
v.) Case No.) 3:18-CV-00296-LRH-CBC
MARTIN TRIPP, an individual,)))
Defendant.)
MARTIN TRIPP, an individual,))
Counterclaimant,)
v.)
TESLA, INC., a Delaware corporation,))
Counterdefendant,))
HIGHLY CONFIDENTIAL	- ATTORNEYS' EYES ONLY
Videotaped Deposition of Judy Wu	
	California
Monday, September 9, 2019	
Michael P. Hensley, RDR, CSR No. 14114	





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THE REPORTER: Thank you. 1 2 BY MR. CARPENTER: 3 And have you worked at other companies, other Ο. 4 manufacturing companies? 5 Yes. Α. 6 Can you talk a little bit about your job Ο. 7 background? 8 So prior to Tesla, I work for Hitachi, the 9 software --10 Yes. Ο. 11 Right. The storage, the semiconductor 12 equipment. And prior to that, I have worked for 13 It's also a manufacturing environment. PerkinElmer. So 14 I have been manufacturing environment inventory 15 industrial end of the field for probably 20 years. 16 Wow, okay. And at -- at other companies you Q. 17 worked with, did they use a similar system? 18 **A**. Not really, because MOS is designed by Tesla. 19 Q. Okay. 20 **A**. It's a customer built. Work very uniquely for 21 Tesla. 22 Okay. But other manufacturers, did they also Q. 23 track the parts? 24 Α. Yes. 25 Q. Okay.

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- where, how this material cost from. Because the MOS is not supposed to give you dollars.
- 3 (Mr. Masia exited the room.)
- 4 BY MR. GATES:
- 5 Q. Okay. Where do you get the dollar value?
- 6 A. Dollar is from our Warp Drive system, which
- 7 | finance people use Warp Drive system as the dollars.
- 8 MOS only provides quantities.
- 9 Q. Do you know whether or not process technicians
- 10 at the Gigafactory are given access to the financial
- 11 data in the Warp system?
- 12 A. It's not -- they are not supposed to have any
- 13 access to Warp Drive data.
- 14 | Q. Okay. So you don't know -- you can't tell from
- 15 | this data whether or not that material cost is correct?
- 16 A. I could not tell from here.
- 17 Q. Okay. Putting aside whether or not the material
- 18 cost is correct, just assume for purposes of my question
- 19 that it is. If you use this quantity of scrap and
- 20 multiplied it by the material cost, would the total
- 21 material cost overstate the actual -- the value of the
- 22 | actual physical scrap?
- 23 A. So this talk about the \$21 million material
- 24 | cost.
- 25 0. Yeah.

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1
     STATE OF CALIFORNIA )
                            SS.
     COUNTY OF ALAMEDA
 1
 3
          I, Michael Hensley, Certified Shorthand Reporter,
     Registered Diplomate Reporter, in and for the State of
 4
 5
     California, Certificate No. 14114,
 6
     do hereby certify:
 7
          That the witness in the foregoing deposition was by
     me first duly sworn to testify to the truth, the whole
 8
9
     truth, and nothing but the truth in the foregoing cause;
10
     that said deposition was taken before me at the time and
11
     place herein named; that said deposition was reported by
12
     me in shorthand and transcribed, through computer-aided
13
     transcription, under my direction; and that the
14
     foregoing transcript is a true record of the testimony
15
     elicited and proceedings had at said deposition.
16
          I do further certify that I am a disinterested
17
     person and am in no way interested in the outcome of
18
     this action or connected with or related to any of the
19
     parties in this action or to their respective counsel.
          In witness whereof, I have hereunto set my hand
20
21
     this 26th day of September, 2019.
22
23
    Michael Hensley, CSR NO. 14114
24
25
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